

Exhibit S

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17 **UNITED STATES DISTRICT COURT**
EASTERN DISTRICT OF MICHIGAN

18
19 EFFIE JOHNSON NORMAN,
TREVOR CREECH, DEZ JONES, and
20 EDWIN MCFARLAND, individually
and on behalf of all others similarly
21 situated,

22 Plaintiffs,

23 v.

24
25 FCA US, LLC,
Defendant.

26 Case No.:

27
28 **EXHIBIT S TO FIRST AMENDED
COMPLAINT: DECLARATION OF
TREVOR CREECH**

I, Trevor Creech, declare:

1. I am a Plaintiff in this action. The following is based upon my personal knowledge, and if called upon as a witness to testify in this matter, I could and would testify competently thereto.

2. I make this Declaration pursuant to California Civil Code section 1780(c) to state facts showing that this action has been commenced in the proper county.

3. Based upon information provided to me by my counsel, it is my belief that Defendant FCA US, LLC (“FCA”) does business in the County of Oakland, a county within the Eastern District of Michigan. The information provided to me comes from FCA’s website at <https://careers.fcagroup.com/where-we-are/north-america-careers-home/north-america-locations/#michigan>, which states that FCA’s World Headquarters and Technology Center are located in Auburn Hills, Michigan.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 29, 2022.

/s/ Trevor Creech
Trevor Creech